

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

BECKY A. MATTHEWS PEASE,
Individually and On Behalf of All Others
Similarly Situated,

Plaintiff,

v.

JACKSON NATIONAL LIFE INSURANCE
COMPANY,

Defendant.

Case No. 17-cv-00284-JTN-ESC

**STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME
FOR EXPERT DISCLOSURE DEADLINES**

At a session of said Court held in the City of Grand Rapids
County of Kent, State of Michigan, on _____
PRESENT: HONORABLE _____

WHEREAS, on June 21, 2017, the Court entered a Case Management Order (ECF No. 11)
setting deadlines for the Disclosure of Expert Witness Reports as follows:

Plaintiff: January 19, 2018

Defendant: March 2, 2018

Rebuttal Reports: March 30, 2018

WHEREAS, the parties have been actively engaged in discovery and working cooperatively in all pretrial activities. Defendant has already produced approximately 5 thousand pages of documents. Defendant is in the process of reviewing an additional 2 million pages of documents and expects to produce those documents on a rolling basis through February 2018. Plaintiff has noticed Defendant's Rule 30(b)(6) deposition. The parties agree that interests of economy and justice will be advanced if Defendant's Rule 30(b)(6) designee is deposed after Defendant completes its document production. The parties further agree that deadlines for

disclosure of expert witness reports should be extended until after Defendant's Rule 30(b)(6) deposition.

WHEREAS, the parties agree to extend the deadline for disclosure of their expert witness reports to provide them with sufficient time to receive, review and utilize documents, deposition testimony, and related discovery materials before disclosure of their respective expert witness reports.

WHEREAS, the parties agree that the modified deadlines for the Disclosure of Expert Witness Reports pursuant to Rule 26(a)(2)(B) will be as follows:

Plaintiff: March 25, 2018

Defendant: May 11, 2018

Rebuttal Reports: May 25, 2018

WHEREAS, this is the parties' first request to modify the Case Management Order. The extension of time to disclose expert witness reports will not cause any delay. The extension does not affect any other deadlines in the Case Management Order.

Upon the stipulation of the parties, and the Court being otherwise advised in the premises:

IT IS ORDERED that the deadlines for the Disclosure of Expert Witness Reports pursuant to Rule 26(a)(2)(B) contained in the Court's June 21, 2017 Case Management Order are hereby modified as follows:

Plaintiff: March 25, 2018

Defendant: May 11, 2018

Rebuttal Reports: May 25, 2018

U.S. DISTRICT JUDGE

WE STIPULATE TO THE ENTRY OF THE ABOVE ORDER; APPROVED AS TO FORM:

BECKY A. MATTHEWS PEASE

**JACKSON NATIONAL LIFE
INSURANCE COMPANY**

By: /s/ Michael McKay
One of Her Attorneys

By: /s/ Stephanie L. Sweitzer
One of Its Attorneys

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CERTIFICATE OF SERVICE

I hereby certify that on December 20, 2017, I electronically filed the forgoing document with the Clerk of the Court using the Court's CM/ECF system, which will send a notice of electronic filing to all CM/ECF participants.

/s/ Kelle J. Winter
Kelle J. Winter